

## 2018 PUBLIC ACCOUNTABILITY QUESTIONNAIRE

This Questionnaire Covers Calendar Year 2017.  
Please return your response to [sonja.nesbit@arentfox.com](mailto:sonja.nesbit@arentfox.com) no later than  
**June 15, 2018.**

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### OWNERSHIP AND ORGANIZATIONAL STRUCTURE

1. Describe the ownership structure of your GPO and/or its parent or affiliated companies, including details regarding the following:
  - Not-for-profit healthcare providers control the majority of the voting interests in our GPO.
  - Not-for-profit healthcare providers are equity holders of our GPO.
  - The corporate form of our GPO is Limited Liability Company.
  - It is organized as a for-profit.
  - Our corporate headquarters are in Andover, Massachusetts.
  
2. Describe the composition of your Board of Directors or other governing body and reflect any changes from the previous HGPII reporting year. Include the following in your response:
  - There are ten individuals serving on our Board.
  - 90% of our Board represents GPO customers.
  - 10% of our Board is an employee of our GPO.
  - None of our Board members are also serving as employees, officers, or directors of a participating vendor.
  - We have a vacant Board seat as a result of a member exiting the partnership.
  
3. Indicate whether any equity holder of your GPO and/or its parent or affiliated companies is a physician (or an immediate family member of a physician).
  - No equity holder of our GPO is a physician or immediate family member of a physician.

### CONFLICT OF INTEREST

4. Describe the GPO's policies and procedures that address conflicts of interest for:
  - Employees in a position of influence with regard to contracting decisions;
  - Clinical Advisory Members; and
  - Members of the GPO's Board of Directors or other governing body.

As part of your response, provide details about reporting requirements for conflicts and provide a copy of written policies.

AND

5. Describe actions the GPO takes to avoid conflict of interest issues for members of the Board of Directors (e.g. disclosure and/or prevention of equity investments in participating vendor relationships and acceptance of gifts/meals/travel/entertainment paid for by vendors).

All Yankee Alliance employees, board members and committee members are included and expected to comply with the Yankee Alliance Code of Conduct and Conflict of Interest Policy. It can be found on our website at <http://www.yankeealliance.com/sites/default/files/PDF/CodeofConduct.pdf>.

No Yankee Alliance employee shall, without appropriate disclosure, own an individual equity interest in any participating supplier where they would be in a position to influence a contracting decision. Yankee Alliance, the corporation, will hold no corporate equity interest in any particular supplier, unless the acquisition of the equity interest demonstrably benefits the Yankee Alliance membership by creating a source for a product or service where there is no other source or very limited sources. Board approval is required for any such investment. Any corporate equity interest approved by the board will be disclosed to the members at the time of investment and as part of the annual disclosure statement to the members. Board and committee members complete an annual statement disclosing relationships they or their families have with organizations Yankee Alliance does business with, stock positions they own, employment relationships they have, and gifts they may have received.

Employees are not allowed to serve on boards of directors of participating vendors. Board and committee members who could hold this type of position must disclose this activity annually and would not be involved in activities related to that participating vendor.

No Yankee Alliance employee shall accept gifts, entertainment, favors, honoraria or personal service payments other than of nominal value from any participating supplier. Nominal value is defined as \$50 per incident and no more than \$200 per calendar year. Yankee Alliance provides no gifts to participating suppliers.

Any officer, director or advisor of Yankee Alliance who is in a position to influence Yankee Alliance contracting decisions and accepts any gifts, entertainment, favors, honoraria or personal service payment other than those of nominal value from any participating supplier will disclose such payment through the completion of their annual disclosure statement. They will be required to recuse themselves from any activity with the participating vendor.

Meals and entertainment are allowed as long as bona fide business matters are discussed. Participation in these activities requires the approval of a member of the Executive Team.

6. Describe the GPO's policies and procedures that address activities, including other lines of business of the GPO and/or its affiliates (including non-GPO services and strategic investments) that might constitute conflicts of interest to the independence of its purchasing activity. [1]

All lines of business relate to GPO or supply chain services.

#### **OTHER LINES OF BUSINESS**

7. Describe other lines of business or investments of the GPO and its affiliates. We are interested in hearing about new as well as nontraditional GPO services that your company and its affiliates are involved with.

Yankee Alliance provides to its members, in addition to GPO services: education, opportunities to network with peers, benchmarking services and assistance in reviewing various operational concerns they may be dealing with.

Yankee Alliance also provides:

- Subject Matter Experts to assist the members in improving their operations – including; purchased services, foodservice, pharmacy, operating room and cardio vascular.
  - Custom contracts negotiated on a member's behalf (addressing their specific needs).
  - Value Analysis fee-for-service consulting which manages the Value Analysis process for hospitals.
  - Proprietary, SUPPLYview, supply chain analytics tool which takes member purchase and inventory order data, matches to contracts to ensure they are paying the right price. It also shows where contract conversions can save money and a benchmarking tool to assist with reducing costs in physician preference items.
  - Medication Evaluation studies which assess the cost impact and savings opportunities of a particular drug or class of drugs.
  - Our wholly-owned subsidiary, Blue.Point, supports hospitals and healthcare providers by identifying, implementing, and sustaining changes to product selection and clinical practice variances that may affect the overall cost and quality of care.
8. What policies or guidelines does the GPO have to address potential conflicts of interest with regard to other lines of business engaged in by the GPO and/or its parent or affiliated companies?

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<sup>1</sup> Business concerns, organizations, or individuals are affiliates of each other if, directly or indirectly, (1) either one controls or has the power to control the other, or (2) a third party controls or has the power to control both. (See 48 CFR, Section 9.403 (2007): Securities Act, Sec. 16, 15 USC 77p(f)).

Yankee Alliance's Corporate Conflict of Interest Policy applies to all lines of business.

## **MONIES FROM VENDORS**

9. Describe the GPO's policy with respect to the receipt of sponsorship funds, grants for research or other educational programs, or any other source of non-administrative fee revenue from vendors. What policies does the GPO have to guard against any potential conflict of interest relating to such payments?

Yankee Alliance does accept grants to sponsor speakers at educational and networking conferences; the grant fees are utilized to offset the speaker fees and travel expenses. Yankee Alliance also encourages, with the approval of the Executive Team, vendor sponsored education offering clinicians continuing education credits. No fees are charged to offer these programs. The Executive Team approves all grants for educational programs.

Yankee Alliance's Corporate Conflict of Interest Policy applies to all lines of business.

10. Does the GPO and/or its parent or affiliated companies accept vendor fees relating to conference sponsorship or exhibit booth space? What policies does the GPO have to guard against a potential conflict of interest relating to vendor participation in industry trade shows, and donations in general?

Yankee Alliance does accept fees related to participation by vendors at our annual educational conference. These fees are utilized to cover the cost of the event. Approval by the Executive Team is required for vendor participation. Fees are tracked and reported by our Finance department.

11. Describe any services or products the GPO or its affiliates provide to vendors on a fee-for-service basis (e.g. data, claims processing, etc.).

No services or products are sold to vendors.

12. Does the GPO make annual disclosures of administrative fees received from vendors for contracting activities with respect to the member's purchase of products and services (e.g. safe harbor reports)? If this document is publicly available, provide an electronic link to this information.

Yes, in accordance with GPO Safe Harbor regulations Yankee Alliance discloses annually to all members administrative fees received from vendors.

13. Does the GPO disclose to members all payments other than administrative fees the GPO receives from any vendor in the course of the GPO's group purchasing activities (e.g. booth space, educational grants, marketing fees, honoraria, etc.) whether from the purchasing activity of those members or not? Describe your disclosure practices.

Fees other than administrative fees are disclosed through our annual disclosure process.

14. Describe the GPO's policy with respect to returning administrative fees to an ineligible vendor.

Any ineligible fees received from a vendor are reconciled and returned to the vendor within 60 days of receipt of the administrative fee payment.

#### **MEMBER FEES**

15. Does the GPO pay fees or offer equity to members upon the signing or re-signing of a participation agreement with the GPO or the joining or renewal of membership in the GPO program?

Yankee Alliance pays no fees and offers no equity for signing or re-signing participation or membership agreements.

#### **BID AND AWARD/CONTRACTING ISSUES**

16. Does the GPO have a publicly-available description of its bid and award process? If so, provide a link and written description of your bid and award process. If not, describe how it may be obtained.

Yes. The process and bid calendar are available on our website at <http://www.yankeealliance.com/content/contracting-process>.

Contract decisions are member-driven through our member advisory committee process. Yankee Alliance staff gathers information about suppliers, products and pricing that committees require to make informed decisions. Additional factors such as minority vendor status are also considered. New technologies that demonstrate significant advantages over current technologies are particularly encouraged.

Contracts are awarded via the committee process based upon the committee's overall evaluation of price, quality and additional factors. The Contract Calendar list's expiration dates as well as dates for submitting proposals. This calendar is updated monthly.

Yankee Alliance also reviews new vendor opportunities on a continual basis.

17. Describe the GPO's requirements for how products or services are published so they are accessible to potential vendors. If a bidder is not awarded a contract, is that bidder able to review the decision criteria used to evaluate the bid? Include in your response a general description of the GPO's criteria for vendor selection.

Yankee Alliance's Contracting Calendar is available to all interested vendors on our website at <http://www.yankeealliance.com/sites/default/files/u144/ContractCal.pdf>.

Yankee Alliance's contracting team communicates to vendors that do not receive an award. Criteria used to drive the decision process are shared with vendors upon request. Yankee Alliance or member specific data, and specific competitive information would not be

shared. Member feedback that was used to drive the final Yankee Alliance award can also be shared in a blinded format upon request.

Yankee Alliance's Supplier Expectations, which are available on the organization's website, details the generic requirements of a vendor wishing to do business with the organization.

Requirements are developed for each contracting opportunity and are communicated with each potential supplier. Yankee may also consider or follow the requirements established by Premier Purchasing Partners, L.P. in determining a responsible bidder in a specific contract category.

Specific requirements are developed for each contracting opportunity based on the wishes of the member advisory committee.

The criteria by which the winning vendor receives an award varies by contract and is defined for each category that is bid, and all participating vendors have the process explained in a face-to-face meeting.

All participating suppliers being considered for an award are asked to inform staff as to their product line, and they have the opportunity to present their product to member committees collectively or at the individual institutions. Upon evaluation, recommendations are made by the member advisory committee.

When Yankee Alliance contracts regionally for products it first surveys the membership to determine what vendors are being utilized. We then survey the market to determine who all the vendors are, what technological changes are taking place and who can service our membership. Proposals and pricing proposals are reviewed, and our advisory committees review and recommend a course of action.

Yankee Alliance also utilizes Premier agreements for national contracts. A similar process is in place to determine if one supplier offers an enhancement over another. This information is then shared with the membership, and they determine what vendor to utilize.

18. Describe the GPO's policy with regard to the use of single, sole, dual, and multi-source procurement and provide an example or two to support use of these contracting tools.

Sole or dual source procurement will only be used when the membership deems it appropriate. If these methodologies were employed they would be voluntary and member driven based on the overall value provided by the award winner.

Yankee Alliance posts our contracting calendar on our website, which is available to all potential suppliers. When contracting for a category all current suppliers and supplier applicants are considered. Yankee Alliance staff prepares and presents pricing, service capability, product equivalency and other decision criteria to our member advisory committee(s). Member advisory committees provide direction to staff and make the final award decision based upon both financial and non-financial criteria. Contracts awarded to

a single vendor, where there is no exclusivity language, are awarded as “convenience” contracts through the same process.

Due to the fact that Yankee Alliance utilizes Premier for national contracts, their committee and contracting structure determines single, sole, dual, or multi-source awards. However, Yankee Alliance will negotiate local contracts based on member feedback and direction. One example where Yankee Alliance utilized these tools was in a recent competitive Pharmacy wholesaler RFP. Based on the direction and feedback given by the membership, Yankee Alliance awarded a sole source to a distributor for a subset of the membership with co-terminus contracts. Through the sole source award the membership was able to realize significant savings due to the aggregation of membership volume, which wouldn’t have been possible otherwise.

19. Does the GPO permit bundling of unrelated products or services from the same vendor or from different vendors? If so, under what circumstances would the GPO consider bundling to be appropriate?

Yankee Alliance does not actively pursue bundling of unrelated products or services from the same vendor or different vendors. Yankee Alliance would consider bundling unrelated products or services from the same vendor if there was a demonstrable value to the member and if member participation is voluntary.

20. Describe the process for contracting for clinical preference items. Describe the GPO’s policy guiding the appropriate length/term of contracts for clinical preference products.

Clinical preference item contract decisions are member-driven through our member advisory committee process and are voluntary. Yankee Alliance staff gathers information about suppliers; products and pricing that committees require to make informed decisions. Additional factors such as minority vendor status are also considered. New technologies that demonstrate significant advantages over current technologies are particularly encouraged.

Contracts are awarded via the committee process based upon the committee's overall evaluation of price, quality and additional factors.

Contracts for clinical preference products are for no more than three years.

Due to the extremely competitive nature of clinical preference item vendors, most of these contracts are negotiated on an individual basis. Yankee Alliance provides custom contracting to members in the physician preference area.

## **ADMINISTRATIVE FEES**

21. What is the GPO’s practice regarding the amount of administrative fees accepted? If there is a written policy, please provide an electronic link or copy of the GPO’s policy regarding these fees.

Yankee Alliance does not accept administrative fees beyond 3%. No other fees are collected that are based on the purchase of a product. There is no minimum fee requirement.

<http://www.yankeealliance.com/content/contracting-process>

22. Describe the conditions in which the GPO accepts administrative fees beyond 3 percent, requiring specific (not blanket) disclosure under the Federal Regulatory Safe Harbor provisions?

Yankee Alliance does not accept administrative fees beyond 3%.

23. Describe the range of administrative fees accepted and examples of the types of contracts (without specifying specific proprietary information) that have administrative fees greater than 3 percent.

The range of administrative fees accepted is 0 – 3%. Yankee Alliance does not accept administrative fees beyond 3%.

#### **PRIVATE LABEL PROGRAMS**

24. Describe whether the GPO has a private label program and if so, describe the products the private label program covers.

No private label program exists at Yankee Alliance.

25. Describe the GPO's practice regarding administrative fees derived from a private label program.

No private label program exists at Yankee Alliance.

#### **VENDOR GRIEVANCE PROCESS**

26. Describe the GPO's policy and process with respect to responding to a vendor's grievance regarding the bid/award process.

The vendor has the right to express a concern about a process or contract award to the Compliance Officer. This information is on our website for vendors to review.

Any grievance will be directed to our Compliance Officer. The process is as follows:

1. Grievance filed with Yankee Alliance staff
2. Situation discussed with vendor
3. Can the situation be resolved with staff? If not, the grievance is brought to the appropriate committee for discussion.
4. If the grievance is not resolved to the vendor's satisfaction, the agreement can be cancelled. All agreements contain a clause allowing the agreement to be cancelled with 60 or 90 days' notice without cause.



27. Did any supplier, since submission of the last GPO's Public Accountability Questionnaire, request an evaluation pursuant to the HGPII Independent Evaluation Process? If so, please provide information regarding the outcome of such evaluation.

No supplier has requested an evaluation.

28. Does the GPO participate in HGPII's Independent Evaluation Process?

Yes.

29. Is the HGPII Independent Evaluation Process displayed on the GPO's public website? If so, please provide an electronic link to this information.

Yes, a link to the HGPII independent vendor grievance review process is displayed on the Supplier section of our website at <http://www.yankeealliance.com/content/suppliers>.

## **INNOVATION**

30. Describe the GPO's policy and process to evaluate and provide opportunities to contract for innovative products and services.

Vendors are encouraged to bring new and visionary technologies to Yankee Alliance's attention as outlined in our Supplier Expectations document, which is available on our website at

<http://www.yankeealliance.com/sites/default/files/u144/Supplier%20Expectation1.pdf>.

If Yankee Alliance feels the technology is truly new and will have a positive cost/quality impact, it is presented to a member committee to determine its applicability.

31. Does the GPO have the right to enter into a GPO contract for innovative technology at any time during its bid and award cycle? Describe the process the GPO has for fostering the development of GPO contracts for innovative products.

Yes, Yankee reserves the right to enter into new contracts at any time where new technology differentiates a product/service from previous product/service categories. Our Supplier Expectations document describes and encourages vendors to present new technologies that offer significant advantages over current technologies.

32. Are GPO members allowed to evaluate products and/or communicate with vendors, regardless of whether a vendor has a contract with the GPO?

Yes.

33. Are GPO members allowed to purchase non-contracted products or services directly from non-participating vendors?

Yes.

## VENDOR DIVERSITY PROGRAMS

34. Describe the GPO's program or activities that encourage contracting with Diverse Vendors (small, women-owned, veteran owned, minority-owned). Explain how you promote or market those programs to the GPO's membership and to Diverse Vendors.

Yankee Alliance strives to support small (S), minority (M), veteran (V), or women (W) owned suppliers. Suppliers that operate as S, M, V, or W will be so noted and considered throughout the contract award process.

Yankee Alliance provides members with access to Premier diversity programs and promotes Premier's contracted diversity suppliers.

Diverse supplier contracts are launched in the same process as any other contract, however, their designation is included in the launch and contract documents, as well as identified in our Microsoft Dynamics® CRM database.

35. Has the GPO increased contracting with Diverse Vendors over the prior year(s)? If so, quantify these increases within each Diverse Vendor category (SBE, WBE, VBE, and/or MBE).

Yankee Alliance's contracting with Diverse Suppliers has remained constant over the prior years.

36. Does the GPO have a Vendor Diversity Committee or other program or group for developing diversity goals and expanding opportunities? If so, describe. What are its mission, goals, and objectives? Does it work directly with the GPO's sourcing team in developing its goals and expanding opportunities? What are the Committee's significant achievements over the GPO's last fiscal year? If it is a Committee, who are its members and how frequently does it meet?

Yankee Alliance strives to support small (S), minority (M), veteran (V), or women (W) owned suppliers. Suppliers that operate as S, M, V, or W will be so noted and considered throughout the contract award process. Yankee Alliance provides members with access to Premier diversity programs and promotes Premier's contracted diversity suppliers.

That said, Yankee does not have a specific diversity committee, rather we take direction from our membership according to their specific contracting needs, as well as consider all vendors that apply through our process and bid calendar available on our website at <http://www.yankeealliance.com/content/contracting-process>.

As an owner of Premier, Yankee Alliance is represented and actively participates in Premier's Supplier Diversity Sourcing Committee.

37. Does the program described in the previous question provide education to member health systems regarding diversity program best practices and/or how to establish a Vendor Diversity Program within their system? Does it solicit member feedback to ensure it is meeting member expectations?

Yankee takes direction from the membership according to their specific contracting needs, as well as considers all vendors that apply through our process and bid calendar available on our website at <http://www.yankeealliance.com/content/contracting-process>.

38. Describe any other actions concerning Vendor Diversity you think are important that are not covered by the preceding questions.

Yankee Alliance's Senior Vice President of Corporate Operations is serving as the Vice Chair of Premier's Supplier Diversity Sourcing Committee and presenting on Building a World Class Supplier Diversity Strategy at Premier's Annual Breakthroughs Conference and Exhibition taking place June 19-22, 2018.

## **ENVIRONMENTALLY-PREFERRED PRODUCTS AND SERVICES**

39. Have members of your GPO expressed a preference for environmentally-preferred products and services?

We do not get frequent inquiries from our membership regarding environmentally-preferred products and services. We do believe our members are interested in learning more about opportunities to purchase environmentally-preferred products and services that are cost neutral.

40. Describe your GPO's approach in identifying and satisfying the desires of your various members for environmentally-preferred products and services. Provide examples of environmentally-preferred products and services within your current portfolio.

All contract decisions are member-driven through our member advisory committee process. Yankee Alliance staff gathers information about suppliers, products, pricing, and additional factors, such as environmentally-preferred status, that committees require to make informed decisions. Examples of environmentally-preferred products and services within our current portfolio are 1) energy intelligence software, demand response, supply services, advisory services and professional services all related to energy efficiency and 2) suction canisters, yankauers, and tubing that have received ISO 14001 Environmental Management System Certification. Yankee Alliance also promotes Premier's contracted environmentally-preferred products and services.

41. What challenges, if any, have you experienced in identifying or contracting for working a variety of environmentally-preferred products and services to your members? How have you responded to such challenges?

We have not experienced any challenges identifying or contracting for environmentally-preferred products and services.

42. Has your GPO designated someone to:

- Identify your GPO's environmentally-preferred objectives;
- Explore environmentally-preferred products and services; and/or

- Develop initiatives to help educate your members about the value of using environmentally-preferred products and services?

At this time, we have not designated someone to focus on environmentally-preferred products and services.

## **CODE OF CONDUCT**

43. Provide a copy of and an electronic link to your GPO's written code of business ethics and conduct. Describe any changes made to it from the previous HGPII reporting year.

There have been no changes to our Code of Conduct since the previous HGPII reporting year. It can be found on our website at <http://www.yankeealliance.com/sites/default/files/PDF/CodeofConduct.pdf>.

44. Describe whether and in what manner the GPO distributes its written code of business ethics and conduct to all applicable employees, agents, contractors, clinical advisory committees, and others involved in group purchasing activity. How often is the code of conduct provided to employees? Do employees receive annual refresher training on the GPO's ethics and the code of conduct? Describe the content of the training and the method of delivery.

Our Ethics at Work document, including the Code of Conduct, is distributed annually to all employees in print and is also available on our intranet. Employees attend annual refresher training on Ethics at Work, including our Code of Conduct. The training is provided by our Compliance Officer. Office employees attend mandatory in-person trainings. Remote employees participate in training via live webinar. The training covers our Ethics at Work document (applicable laws and expectations regarding business ethics), Code of Conduct, Insider Trading, Conflict of Interest Policy, Whistleblower Policy, and Anti-Harassment Policy.

Both our advisory committees and board receive the Code of Conduct annually along with our annual Conflict of Interest Policy. They are also available electronically on our website.

45. Describe the mechanism (e.g., a corporate review board, ombudsman, corporate compliance or ethics officer) for employees to report possible violations of the written code of business ethics and conduct to someone other than one's direct supervisor, if necessary.

Reports can be made to the Compliance Officer or Board Chairman directly.

## **REPORTING POTENTIAL ETHICAL VIOLATIONS**

46. What process is used to protect the confidentiality of the reporting employee's identity and what safeguards are in place to mitigate the opportunities for retaliation?

Reports can be made via email, telephone, or anonymously directly to the Compliance Officer. The confidentiality of the reporting employee is emphasized in the training that all employees receive annually.

Reports are investigated promptly, discreetly, and professionally. Employees are instructed to make reports directly to the Compliance Officer to ensure they are protected against retaliation. Our Whistleblower Policy, including protection from retaliation, is also emphasized in our annual training.

In the event that the report concerns the Compliance Officer, employees are instructed to contact the Board Chairmain.

47. Describe how the GPO follows up on reports of suspected violations of the code of business ethics and conduct to determine if a violation has occurred and if so, who was responsible. Describe corrective and other actions taken in such circumstances.

The Compliance Officer is responsible for conducting investigations of reports of ethics violations. Any employee, regardless of position in the organization, who is found to have committed an ethics violation, will be subject to disciplinary action up to and including termination. Discussions and inquiries will be handled promptly, discreetly and kept in strict confidence to the extent appropriate by policy or law.

48. Describe the processes the GPO follows up on, to monitor on a continuing basis, adherence to the written code of business ethics and conduct, and compliance with applicable federal laws.

Our Compliance Officer is alerted immediately when a new entry is made by an employee in our Supplier Activity Report. Employee expense reports related to meetings with vendors are reviewed periodically to ensure compliance with our Conflict of Interest Policy. Our entire management team has an open door policy to maintain lines of communication with employees and ensure employees feel comfortable speaking with our Compliance Officer or other members of our management team regarding compliance concerns that may arise.

Leadership actively fosters an ethical culture by emphasizing the welfare of the organization depends on employees challenging our business practices if they are concerned they may undermine our ethical principles. Employees are also assured that reporting concerns will not be met with retaliation.

As HGPII produces the annual public accountability questionnaire each year our Compliance Officer and CEO review Yankee Alliance's process and tools to ensure they meet the standard set by the industry.

49. Are periodic reports on the GPO's ethics and compliance program made to the GPO's Board of Directors or to a committee of the Board? If so, please state how often and in general, what information is reported? Are periodic reports on the company's

participation in HGPII made to the GPOs Board of Directors or to a committee of the Board? If so, please state how often and in general, what information is reported.

Annually a report is given to the board by the Compliance Officer or CEO providing an update on the ethics and compliance program.

The CEO presents a summary report on the company's participation in HGPII at the fall annual board meeting.

50. How many of your GPO employees attended the most recent Best Practices Forum? Include the name of the most senior executive who attended.

One employee, Melanie Kawiecki, Senior Vice President of Finance, attended the Best Practices Forum in 2018.

51. List the name, title and contact information of the senior manager assigned responsibility to oversee the business ethics and conduct program. Provide the name, title and contact information for the individual(s) responsible for responding to this report.

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